

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No.: 3:21-CV-00259-DCG-JES-JVB
[Lead Case]

ROY CHARLES BROOKS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No.1-21-CV-00991-DCG-JES-JVB
[Consolidated Case]

BROOKS PLAINTIFFS' SECOND AMENDED EXHIBIT LIST

Exhibit No.	Description	Offered	Admitted
1	Declaration of Senator Kel Seliger (PI Motion Ex. 1)		X
2	Declaration of Senator Beverly Powell (PI Motion Ex. 2)		X
3	Sen. Powell Letter to Chair Huffman dated 10-30-2019 (PI Motion Ex. 2-A)		X
4	Sen. Powell Letter to Chair Huffman dated 02-18-2020 (PI Motion Ex. 2-B)		X
5	Materials to Chair Huffman (PI Motion Ex. 2-C)		X
6	Declaration of Garry Jones (PI Motion Ex. 3)		X
7	Map of ACS 2014-2018 5-Year Estimates (PI Motion Ex. 3-A)		X
8	Sean Opperman Email re: Redistricting Dropbox Update dated 08-19-2021 (PI Motion Ex. 3-B)		X
9	2018-2019 ACS Maps (PI Motion Ex. 3-C)		X
10	2018-2019 ACS Racial Population Change Maps (PI Motion Ex. 3-D)		X

11	Garry Jones Email to S. Opperman and A. Mackin re: Letter from Sen Powell to Sen Huffman dated 09-16-2021 (PI Motion Ex. 3-E)		X
12	S. Opperman Reply Email, dated 09-17-2021 (PI Motion Ex.3-F)		x
13	Full Senate Email re: Regarding concerns with proposed redraw of SD10 dated 09-18-2021 (PI Motion Ex. 3-G)		X
14	Huffman Email Read Receipt (PI Motion Ex. 3-H)		X
15	S. Opperman Email re: Map Release dated 09-18-2021 (PI Motion Ex. 3-I)		X
16	Written Testimony re: 09-24-2021 Hearing (PI Motion Ex. 3-J)		X
17	Powell Portal Submission, Part 1 (PI Motion Ex. 3-K, Part 1)		X
18	Powell Portal Submission, Part 2 (PI Motion Ex. 3-K, Part 2)		X
19	House Committee Email re: Concerns Regarding SB 4 and Proposed SD 10 dated 10-10-2021 (PI Motion Ex. 3-L)		X
20	Full House Email re: Concerns regarding SB4 and proposed redraw of SD10 dated 10-14-2021 (PI Motion Ex. 3-M)		X
21	Texas Demographic Center Report SD10 (PI Motion Ex. 3-N)		X
22	Declaration of Eric Richard "Rick" Svatora (PI Motion Ex. 4)		x
23	Svatora Notes (PI Motion Ex. 4-A)		X
24	Declaration of Representative Chris Turner (PI Motion Ex. 5)		X
25	Declaration of Mark P. Gaber (PI Motion Ex. 6)		X
26	Mackin Exhibit Objections Email (PI Motion Ex. 6-A)		X
27	Perez Racial Shading Exhibits, Part 1 (PI Motion Ex. 6-B, Part 1)		X
28	Perez Racial Shading Exhibits, Part 2 (PI Motion Ex. 6-B, Part 2)		X
29	Perez Racial Shading Exhibits, Part 3 (PI Motion Ex. 6-B, Part 3)		X
30	Perez Racial Shading Exhibits, Part 4 (PI Motion Ex. 6-B, Part 4)		X
31	Perez Racial Shading Exhibits, Part 5 (PI Motion Ex. 6-B, Part 5)		X
32	Mackin Email dated 07-14-2021 (PI Motion Ex. 6-C)		X
33	Gov. Abbott Letter to Sen. Keliger and Rep. Darby dated 04-18-2013 (PI Motion Ex. 6-D)		X
34	Senate Redistricting Hearing Transcript (04-18-2013) (PI Motion Ex. 6-E)		X
35	Senate Redistricting Hearing Transcript, Part 1 (05-30-2013) (PI Motion Ex. 6-F, Part 1)		X
36	Senate Redistricting Hearing Transcript, Part 2 (05-30-2013) (PI Motion Ex. 6-F, Part 2)		X
37	Senate Journal, 06-14-2013, 2 nd day continued, Addendum (PI Motion Ex. 6-G)		X
38	Senate Journal, 06-14-2013, 3 rd day (PI Motion Ex. 6-H)		X
39	Senate Journal, 10-04-21, 3 rd day (PI Motion Ex. 6-I)		X

40	Senate Journal, 10-04-21, 4 th day (PI Motion Ex. 6-J)		X
41	Senate Journal, 10-04-21, 4 th day Addendum (PI Motion Ex. 6-K)		X
42	House Journal, 10-15-21, 6 th day continued (PI Motion Ex. 6-L)		X
43	House Journal, 10-15-21, 7 th day (PI Motion Ex. 6-M)		X
44	Report by Dr. Matt Barreto dated November 24, 2021 (PI Motion Ex. 7)		X
45	Report by Dr. Jeronimo Cortina dated January 7, 2022		X
46	Declaration of Roy Charles Brooks (PI Motion Ex. 8)		X
47	Declaration of Felipe Gutierrez (PI Motion Ex. 9)		X
48	Declaration of Phyllis Goines (PI Motion Ex. 10)		X
49	Declaration of Eva Bonilla (PI Motion Ex. 11)		X
50	Declaration of Clara Faulkner (PI Motion Ex. 12)		X
51	Declaration of Deborah Spell (PI Motion Ex. 13)		X
52	Senate Redistricting Hearing Transcript (09-24-2021) (PI Motion Ex. 14)		X
53	Senate Redistricting Hearing Transcript (09-25-2021) (PI Motion Ex. 15)		X
54	Senate Redistricting Hearing Transcript (09-28-2021) ((PI Motion Ex. 16)		X
55	Benchmark Plan Deviation Map ((PI Motion Ex. 17)		X
56	Plan S2168 Map ((PI Motion Ex. 18)		X
57	Plan S2168 Population Analysis (PI Motion Ex. 19)		X
58	Plan S2168 District Population and VAP (PI Motion Ex. 20)		X
59	Plan S2168 Incumbents by District (PI Motion Ex. 21)		X
60	Plan S2168 ACS ((PI Motion Ex. 22)		X
61	Plan S2168 2018 Election (PI Motion Ex. 23)		X
62	Plan S2168 20 Election (PI Motion Ex. 24)		X
63	Plan S2100 Benchmark Map (PI Motion Ex. 25)		X
64	Plan S2100 District Population VAP (PI Motion Ex. 26)		X
65	Plan S2100 ACS (PI Motion Ex. 27)		X
66	Dallas/Fort Worth Hispanic VAP Benchmark Plan (PI Motion Ex. 28)		X
67	Dallas/Fort Worth Hispanic VAP Plan S2168 ((PI Motion Ex. 29)		X
68	Dallas/Fort Worth Black VAP Benchmark (PI Motion Ex. 30)		X
69	Dallas/Fort-Worth Black VAP Plan S2168 (PI Motion Ex. 31)		X
70	Alternative Plan 1 Maps (PI Motion Ex. 32)		X
71	Alternative Plan 1 Population Data (PI Motion Ex. 33)		X
72	Alternative Plan 1 ACS Data (PI Motion Ex. 34)		X
73	Alternative Plan 1 2018 Election Data (PI Motion Ex. 35)		X
74	Alternative Plan 1 2020 Election Data (PI Motion Ex. 36)		X
75	Alternative Plan 1 Incumbents by District PI Motion Ex. 37)		X
76	Alternative Plan 2 Maps (PI Motion Ex. 38)		X
77	Alternative Plan 2 Population (PI Motion Ex. 39)		X
78	Alternative Plan 2 ACS Data (PI Motion Ex. 40)		X

79	Alternative Plan 2 2018 Election Data (PI Motion Ex. 41)		X
80	Alternative Plan 2 2020 Election Data (PI Motion Ex. 42)		X
81	Alternative Plan 2 Incumbents by District (PI Motion Ex. 43)		X
82	Declaration of Matt Barreto (PI Reply Motion Ex. 44)		X
83	Plan S2168 and S2100 Population Overlap Report (PI Reply Motion Ex. 45)		X
84	Alternative Plan 3 Maps (PI Reply Motion Ex. 46)		X
85	Alternative Plan 3 Population Data (PI Reply Motion Ex. 47)		X
86	Alternative Plan 3 ACS Data (PI Reply Motion Ex. 48)		X
87	Alternative Plan 3 2018 Election Data (PI Reply Motion Ex. 49)		X
88	Alternative Plan 3 2020 Election Data (PI Reply Motion Ex. 50)		X
89	Alternative Plan 3 Incumbents by District (PI Reply Motion Ex. 51)		X
90	Alternative Plan 3 Population Overlap with Plan S2168 (PI Reply Motion Ex. 52)		X
91	Alternative Plan 3 Population Overlap with Plan S2100 (PI Reply Motion Ex. 53)		X
92	Alternative Plan 4 Maps (PI Reply Motion Ex. 54)		X
93	Alternative Plan 4 Population Data (PI Reply Motion Ex. 55)		X
94	Alternative Plan 4 ACS Data (PI Reply Motion Ex. 56)		X
95	Alternative Plan 4 2018 Election Data (PI Reply Motion Ex. 57)		X
96	Alternative Plan 4 2020 Election Data (PI Reply Motion Ex. 58)		X
97	Alternative Plan 4 Incumbents by District (PI Reply Motion Ex. 59)		X
98	Alternative Plan 4 Population Overlap with Plan S2168 (PI Reply Motion Ex. 60)		X
99	Alternative Plan 4 Population Overlap with Plan S2100 (PI Reply Motion Ex. 61)		X
100	Rebuttal Report of Dr. Barreto dated January 19, 2022		X
101	Rebuttal Report of Dr. Cortina dated January 19, 2022		X
102	Text Messages of Lt. Governor Dan Patrick, Kevin Sparks, et al.		X
103	Senate Plan Comments of James Beauchamp/MOTRAN		X
104	Texas Demographic Center Presentation to Senate Select Redistricting Committee (Oct. 29, 2019)		X
105	Dr. Barreto Curriculum Vitae		X
106	January 23, 2022 Email Exchange Between Counsel Regarding Dr. Alford's EI Data		X
107	Plan C2163 Map Packet		
108	Plan C2163 County Map Hisp Shading		
109	Plan C2163 Statewide Map Hisp Shading		

110	Plan C2163 Reports (R116 R135 R225 R235 R240 R315 R340)		
111	Plan C2167 County Map Hisp Shading		
112	Plan C2167 Statewide Map Hisp Shading		
113	Plan 2167 Reports (R116 R135 R225 R235 R240 R315 R340)		
114	Plan C2193 County Map- Black Shading		
115	Plan C2193 County Map- Hisp Shading		
116	Plan C2193 - District Maps		
117	Plan C2193 - Statewide Map- Hisp Shading		
118	Plan C2193 - Reports (R116 R135 R225 R235 R240 R315 R340)		
119	Plan 2316- County Map- Black Shading		
120	Plan 2316- County Map- Hisp Shading		
121	Plan 2316- District Maps		
122	Plan 2316- Statewide Map- Black Shading		
123	Plan 2316- Statewide Map- Hisp Shading		
124	Plan H2316 Reports (R116, R225, R135)		
125	Plan H2316 Reports R235		
126	Plan H2316 Reports R240		
127	Plan H231- Reports R315 R340		
128	Plan H2176 County Map- Hisp Shading		
129	Plan H2176-Report R340 - PopAnalysis		
130	Plan H2176 Reports R116 R135 R225		
131	Plan H2176 Reports R235 R240 R315 R340T		
132	Plan H2176 Statewide Map- Hisp Shading		
133	Plan S2132 County Map – Black Shading		
134	Plan S212 County Map – Hisp Shading		
135	Plan S2132 District Maps		
136	Plan S2132 Reports (R116, R135, R225, R235, R240, R315, R340)		
137	Plan S2132 Statewide Map – Black Shading		
138	Plan S2132 Statewide Map – Hisp Shading		
139	Plan S2134 County Map – Black Shading		
140	Plan S2134 County Map – Hisp Shading		
141	Plan S2134 District Maps		
142	Plan S2134 Reports (R116, R135, R225, R235, R240, R315, R340)		
143	Plan S2134 Statewide Map – Black Shading		
144	Plan S2134 Statewide Map – Hisp Shading		
145	Plan S2168 County Map – Black Shading		
146	Plan S2168 Couty Maps – Black Shading		
147	Plan S2168 District Maps		

148	Plan S2168 Reports (R116, R135, R225)		
149	Plan S2168 Reports (R240, R315, R340)		
150	Plan S2168 Statewide Map – Black Shading		
151	Plan S2168 Statewide Map – Hisp Shading		
152	2022 General Election Returns.csv		
153	2024 General Election Returns.csv		
154	AG-22G.csv		
155	Comptroller-22G.csv		
156	Gov-22G.csv		
157	LandComm-22G.csv		
158	LtGov-22G.csv		
159	Pres-24G.csv		
160	SBOE1-24G.csv		
161	SBOE10-24G.csv		
162	SBOE11-24G.csv		
163	SBOE15-24G.csv		
164	StateRep17-22G.csv		
165	StateRep17-24G.csv		
166	StateRep24-22G.csv		
167	StateRep30-24G.csv		
168	StateRep32-24G.csv		
169	StateRep43-24G.csv		
170	StateRep44-22G.csv		
171	StateRep44-24G.csv		
172	StateRep53-22G.csv		
173	StateRep53-24G.csv		
174	StateRep58-24G.csv		
175	StateRep68-24G.csv		
176	StateRep71-22G.csv		
177	StateRep71-24G.csv		
178	StateRep74-22G.csv		
179	StateRep74-24G.csv		
180	StateRep75-22G.csv		
181	StateRep80-24G.csv		
182	StateRep96-24G.csv		
183	StateRep97-22G.csv		
184	StateRep97-24G.csv		
185	StateRep118-22G.csv		
186	StateRep118-24G.csv		
187	StateSenS-22G.csv		
188	StateSenS-24G.csv		

189	StateSen17c22G.csv		
190	StateSen17-24G.csv		
191	StateSen18-22G.csv		
192	StateSen19-22G.csv		
193	StateSen20-22G.csv		
194	StateSen21-22G.csv		
195	StateSen27-22G.csv		
196	StateSen27-24G.csv		
197	SupCt2-24G.csv		
198	SupCt3-22G.csv		
199	SupCt4-24G.csv		
200	SupCtS-22G.csv		
201	SupCt6-24G.csv		
202	SupCt9-22G.csv		
203	USRep10-22G.csv		
204	USRep10-24G.csv		
205	USRep12-22G.csv		
206	USRep12-24G.csv		
207	USRep17-22G.csv		
208	USRep17-24G.csv		
209	USRep19-22G.csv		
210	USRep23-24G.csv		
211	USRep27-22G.csv		
212	USRep27-24G.csv		
213	USRep28-22G.csv		
214	USRep28-24G.csv		
215	USRep33-22G.csv		
216	USRep33-24G.csv		
217	USS-24G.csv		
218	Voter Data_2022.csv		
219	Voter Data_2024.csv		
220	VTDs_24PG_Pop.txt		
221	Expert Report of Dr. Matt A. Barreto dated May 20, 2022		
222	Rebuttal Report of Dr. Matt A. Barreto dated July 27, 2022		
223	Supplemental Expert report of Dr. Matt A. Barreto dated March 31, 2025		
224	Rebuttal Report of Dr. Matt A. Barreto dated April 16, 2025		
225	Dr. Matt A. Barreto CV April 2025		
226	Expert Report of Dr. Tye Rush dated March 31, 2025		
227	Dr. Tye Rush CV		
228	Expert Report of Dr. Morgan Kousser dated June 1 ,2022		

229	Declaration of Jose Reyes		
230	Declaration of Clara Faulkner		
231	Declaration of Eva Bonilla		
232	Declaration of Felipe Guitierrez		
233	Declaration of Martin Saenz		
234	Declaration of Norma Anel Perez-Cavazos		
235	Declaration of Phyllis Goines		
236	Declaration of Deborah Spell		
237	Declaration of Sandra Puente		
238	Declaration of Lydia Alcalan		
239	Declaration of Roy Charles Brooks		
240	PLANH2316_r225_Election14G		
241	PLANH2316_r225_Election16G		
242	PLANH2316_r225_Election18G		
243	PLANH2316_r225_Election20G		
244	PLANH2316_r225_Election22G		
245	PLANH2316_r225_Election24G		
246	Supplemental Expert Report of Dr. Matt A. Barreto dated June 15, 2022		
247	Turcios Post		

Brooks Plaintiffs also designate as exhibits all those exhibits they have included in the drive shared between Plaintiffs and Defendants that are proposed as joint exhibits. In the event a party objects to any exhibits in the shared drive, Brooks Plaintiffs intend to designate them as their individual exhibits.

May 29, 2025

Respectfully submitted,

/s/ Chad W. Dunn

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CERTIFICATE OF SERVICE

I certify that all counsel of record were served a copy of the foregoing this 29th day of May 2025, by email.

/s/ Chad W. Dunn
Chad W. Dunn